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Attorneys for Respondent

Bombard Mechanical, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED ASSOCIATION OF JOURNEYMEN)

AND APPRENTICES OF THE PLUMBING &)

PIPE FITTING INDUSTRY OF THE )

UNITED STATES AND CANADA, LOCAL )

525, LAS VEGAS, NEVADA AFL-CIO, )

Petitioner, )

vs. )

BOMBARD MECHANICAL, LLC, a Nevada )

Limited Liability Company, and DOES I-V, )

ROES VI-X, )

Respondents. )

Case No. 2:19-cv-00431-JAD-CWH

**STIPULATION AND REQUEST TO  
EXTEND BRIEFING DEADLINES  
ASSOCIATED WITH PETITIONER'S  
MOTION TO COMPEL  
ARBITRATION**

(First Request)

Pursuant to LR IA 6-1 and LR 7-1, the Parties, Petitioner, United Association of Journeymen and Apprentices of the Plumbing & Pipe Fitting Industry of the United States and Canada, Local 525, Las Vegas, Nevada AFL-CIO and Bombard Mechanical, LLC, by and through their respective counsel of record, hereby stipulate and request that the Court extend the briefing deadlines associated with Petitioner's Motion to Compel (ECF No. 22), which was filed on July 16, 2019.

In support of this Stipulation and Request, the Parties provide the following:

**KAMER ZUCKER ABBOTT** Attorneys at Law

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1. Pursuant to its Order of May 21, 2019 (ECF No. 13), the Court set a deadline of July 20, 2019 for the Petitioner to file its Motion to Compel Arbitration.
2. The Parties discussed the Court's Order (ECF No. 13), Petitioner's intention to file its Motion to Compel Arbitration on or before July 20, 2019, and the briefing deadlines associated with said Motion during their Rule 26(f) conference on June 6, 2019. See Stipulated Joint Discovery Plan (ECF No. 19), at 3.
3. Given the procedural and substantive issues involved in this matter, as well as counsels' existing litigation and case commitments, Respondent estimated needing thirty (30) days to respond to Petitioner's Motion to Compel with the Petitioner requiring twenty-one (21) days to submit its reply. The need for said briefing schedule was set forth in the Parties' Stipulated Joint Discovery Plan (ECF No. 19). See id. at 3.
4. As Petitioner's Motion to Compel Arbitration was filed on July 16, 2019 (ECF No. 22), Respondent's current deadline to respond is July 30, 2019.
5. Pursuant to the briefing schedule agreed upon during the Rule 26(f) conference, the Parties seek an extension of Respondent's current deadline to respond to the Motion to Compel Arbitration up to and including August 15, 2019.
6. In turn, consistent with the briefing schedule agreed upon during the Rule 26(f) conference, the Parties seek an extension of the Petitioner's deadline to submit a reply in support of its Motion to Compel Arbitration up to and including September 5, 2019.
7. This is the first requested extension of the briefing deadlines associated with Petitioner's Motion to Compel (ECF No. 22). No previous extensions of time have been granted.
8. This request is brought in good faith and not sought for the purpose of delay or any other improper purpose.

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1 WHEREFORE, for the reasons set forth above, the Parties respectfully request the Court: (1)  
2 extend the deadline for Respondent to respond to Petitioner's Motion to Compel Arbitration (ECF  
3 No. 22) up to and including August 15, 2019; and (2) extend the deadline for Petitioner to submit a  
4 reply in support of its Motion to Compel Arbitration up to and including September 5, 2019.

5 DATED this 23<sup>rd</sup> day of July, 2019.

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7 DOBBERSTEIN LAW GROUP

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8  
9 By: /s/ Francis J. Morton

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20 Apprentices of The Plumbing & Pipe Fitting  
21 Industry of The United States and Canada,  
22 Local 525, Las Vegas, Nevada AFL-CIO

By: /s/ Edwin A. Keller, Jr.

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23 IT IS SO ORDERED:

24   
25 UNITED STATES DISTRICT COURT JUDGE

26 DATED: 7/23/2019  
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